

### REMARKS

The Applicants have carefully considered this application in connection with the Examiner's Action and respectfully request reconsideration of this application in view of the foregoing amendment and the following remarks.

The Applicants originally submitted Claims 1-34 in the application. Previously, the Applicants amended Claims 1, 3-4, 7, 9, 10-12, 14-20, 22, 24-26, 28 and 30-36 and canceled Claims 6, 8, 13, 21, 23, 27 and 29.

Presently, the Applicants have amended independent Claims 1, 19 and 35. Support for the amendment includes for example former claim 14 (now canceled) claim 31 and paragraph [0030]. Dependent Claims 7, 9, 11, 12, 15, 16, 18, 31, 32, 34 are amended to correct antecedent basis issues associated with the amendments to the independent claims.

Accordingly, Claims 1-5, 7, 9-12, 15-20, 22, 24-26, 28 and 30-36 are currently pending in the application.

**I. Rejection of Claims 1-5, 7, 9-12, 15-20, 22, 24-25, 26, 28, 30-36 under 35 U.S.C. §103**

The Office Action has rejected Claims 1-5, 7, 9-12, 15-20, 22, 24-25, 26, 28, and 30-36 under 35 U.S.C. §103(a) as being unpatentable over the admitted state of the art ("ASA") in view of U.S. Patent No. 5,963,840 to Xia *et al.* ("Xia").

In response, the Applicants respectfully submit that the Office Action has not established a *prima facie* case of obviousness of the claims.

Claim 1, among other things, "exposing the surface to a hydrogen bake, wherein step c2 is done between exposing the surface to the nitrogen-containing gas and depositing the second material layer." Analogous language is present in independent Claims 19 and 35.

The Office Action has not shown how the ASA in view Xia teaches or suggests these

features of Claims 1, 19 and 35. For instance, the ASA (paragraph [0016]) discloses that a high temperature hydrogen bake is impractical while using a hot plate system. In contrast to the ASA, the present application discloses that the hydrogen bake beneficially removes fluorine contaminants left behind by the  $\text{NF}_3$  clean step (paragraph [0030]). Based upon the considerations, the Applicants submit that one of ordinary skill in the art would not have motive to add the hydrogen bake between exposing the surface to the nitrogen-containing gas and depositing the second material.

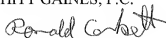
In view of the foregoing remarks, the prior art as applied in the Office Action does not support the rejection of Claims 1, 19, and 35 or their respective dependent claims under 35 U.S.C. '103(a). The Applicants therefore respectfully request the Examiner to withdraw these rejections.

## **II. Conclusion**

In view of the foregoing amendment and remarks, the Applicants now see all of the Claims currently pending in this application to be in condition for allowance and therefore earnestly solicit a Notice of Allowance for Claims 1-5, 7, 9-12, 14-20, 22, 24-26, 28 and 30-36.

The Applicants request the Examiner to telephone the undersigned attorney of record at (972) 480-8800 if such would further or expedite the prosecution of the present application. The Commissioner is hereby authorized to charge any fees, credits or overpayments to Deposit Account 08-2395.

Respectfully submitted,  
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Dated: December 15, 2008  
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